

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In Re:

JAMES W. BUGGY JR.
Debtor(s)
FEDERAL HOME LOAN MORTGAGE
CORPORATION, AS TRUSTEE FOR
FREDDIE MAC SEASONED LOANS
STRUCTURED TRANSACTION TRUST,
SERIES 2021-1

Movant

v.

JAMES W. BUGGY JR.
Debtor(s)
MICHELE C. BUGGY
Co-Debtor
SCOTT F. WATERMAN
Trustee
Respondent(s)

Chapter 13

Case Number: 25-11045-amc

**MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY WITH RESPECT TO
PROPERTY: 65 GLENN ROAD, TOWNSHIP OF ASTON, PA 19014**

Federal Home Loan Mortgage Corporation, as Trustee for Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2021-1, through its Counsel, Stern & Eisenberg PC, respectfully requests the Court grant its Motion for Relief and §1301 and in support thereof respectfully represents as follows:

1. Movant is Federal Home Loan Mortgage Corporation, as Trustee for Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2021-1 (hereafter referred to as “Movant”).
2. Debtor(s), James W. Buggy (hereinafter, “Debtor(s)”), is/are, upon information and belief, adult individual(s) whose last-known address is 65 Glenn Road, Township of Aston, PA 19014.
3. On September 29, 2004, James W. Buggy and Michele C. Buggy, executed and delivered a Note in the principal sum of \$230,000.00 to Weichert Financial Services. A copy of the Note is attached as Exhibit “A” and is hereby incorporated by reference.
4. As security for the repayment of the Note, James W. Buggy and Michele C. Buggy, executed and delivered a Mortgage to Mortgage Electronic Registration Systems Inc., as Nominee for Weichert Financial Services. The Mortgage was duly recorded in the Office of the Recorder of Deeds in and for Delaware County on October 5, 2004 in Book 03309, Page 0452 and/or Instrument 2004121630. A copy of the Mortgage is attached as Exhibit “B” and is hereby incorporated by reference.
5. The Mortgage encumbers Debtor’s real property located at 65 Glenn Road, Township of Aston, PA 19014.
6. By assignment of mortgage, the loan was ultimately assigned to Federal Home Loan Mortgage Corporation, as Trustee for Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2021-1. A true and correct copy of the assignment is attached as Exhibit “C” and is hereby incorporated by reference.
7. Debtor(s) filed the instant Chapter 13 Bankruptcy on March 18, 2025 and, as a result, any state court proceedings were stayed.
8. It is believed and therefore averred that Debtor(s) filed the instant bankruptcy as an additional delay in

order to prevent Movant from proceeding with the state court proceedings or otherwise institute proceedings as allowed under the Mortgage.

9. Debtor's mortgage loan is in default and is currently due for the April 1, 2025 payment and each subsequent payment through the date of the motion. Debtor(s) has/have failed to make the following post-petition payments to Movant:

POST-PETITION PAYMENTS IN DEFAULT

Monthly Payments in Default	04/01/2025 to 06/01/2025
Monthly payments (\$2,226.53 x 3)	\$6,679.59
Total Amounts Due as of June 13, 2025:	\$6,679.59

10. In addition, Movant has incurred counsel fees and costs in association with Debtor's default and this motion.
11. As a result of the Debtor's default and failure to make payments or to otherwise adequately provide for Movant in the bankruptcy filing, Movant is not adequately protected and is entitled to relief.
12. To the extent the Court does not find that relief is appropriate, then Movant requests that the stay be conditioned such that in the event the Debtor(s) fall(s) behind on post-petition payments or trustee payments that Movant may receive relief upon default by the Debtor(s) of the terms of the conditional order.
13. NewRez LLC dba Shellpoint Mortgage Servicing services the underlying mortgage loan and note for the property referenced in this motion for Movant. In the event the automatic stay in this case is modified, this case dismisses, and/or the Debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Movant. Movant, directly or through an agent, has possession of the Note. The Note is endorsed in blank. Movant is the beneficiary or the assignee of the Deed of Trust.
14. Movant requests that the stay of Bankruptcy Rule 4001(a)(3) be waived.

WHEREFORE, Movant, Federal Home Loan Mortgage Corporation, as Trustee for Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2021-1, respectfully requests this Court to grant the appropriate relief under 11 U.S.C. §362 and §1301 from the automatic stay as set forth in the proposed order together with waiver of Bankruptcy Rule 4001(a)(3).

Respectfully Submitted:
Stern & Eisenberg, PC

By: /s/ Daniel P. Jones
Daniel P. Jones
Bar Number: 321876
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Date: July 11, 2025